

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**UNITED STATES**

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**No. 19-CR-567**

**Hon. Judge Leinenweber**

**ROBERT KELLY, *et. al.*,**

**DEFENDANT’S MOTION FOR THE PRODUCTION OF DOCUMENTS  
DEMONSTRATING OR RELATING TO ANY COMPLAINTS MADE AGAINST  
ANY AGENT OR MEMBER OF LAW ENFORCEMENT WHO MAY  
TESTIFY AT TRIAL RELATING TO THE TRUTHFULNESS OR VERACITY  
OF ANY SUCH INDIVIDUAL, OR TO ANY PROCEEDINGS OR  
INVESTIGATIONS REGARDING THE SAME**

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Defendant, Mr. Kelly, by and through his undersigned counsel, respectfully moves this Court for the entry of an Order, requiring the Government to produce to the Defendant and his counsel, at least 45 days prior to trial, all documents reflecting or relating to any complaints, proceedings, or investigations regarding the truthfulness or veracity of any agent or member of law enforcement who may be called by the Government to testify at trial, and states as follows:

1. Here, like every case in which an agent or other member of law enforcement testifies at trial, the truthfulness and veracity of those individuals may be called into question.

Accordingly, all documents reflecting any instance where such individuals either testified falsely, or made false statements, or are even alleged to have engaged in those types of activities, are directly relevant to their testimony in this case – including, most importantly on cross-examination.

2. Moreover, the above-referenced materials may constitute *Brady* materials.

3. Accordingly, the Government should be required to produce all such materials to the

Defendants and their counsel at least 45 days prior to trial.

**WHEREFORE**, Defendant, Mr. Kelly, by and through his undersigned counsel, respectfully moves this Court for the entry of an Order, requiring the Government to produce to the Defendants and their counsel, at least 45 days prior to trial, all documents reflecting or relating to any complaints, proceedings, or investigations relating to the truthfulness or veracity of any agent or member of law enforcement who may be called by the Government to testify at trial, and for such other and further relief as is appropriate.

**RESPECTFULLY SUBMITTED:**

By: s/ Michael I. Leonard  
**Counsel for Defendant Kelly**

**LEONARDMEYER, LLP**

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**CERTIFICATE OF SERVICE**

The undersigned states that on February 3, 2020, he caused the above to be served on all counsel of record by way of ECF filing it.

**RESPECTFULLY SUBMITTED,**

**By: s/Michael Leonard**  
**Counsel for Defendant Kelly**